

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JERMAINE HARRIS, as Independent)	
Administrator to Collect for the Estate of Lee)	
Harris,)	
)	
Plaintiff,)	Case No. 23-cv-14220
)	
v.)	Judge Joan H. Lefkow
)	
RICHARD ZULEY, <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANT CITY’S RESPONSE TO PETITION TO
APPROVE SETTLEMENT AND ALLOCATION OF PROCEEDS**

Defendant, City of Chicago (“City”), through its undersigned counsel, Burns Noland LLP, responds to Petitioner/Plaintiff’s Petition to Approve Settlement and Allocation of Proceeds as follows:

1. On January 30, 2025, Plaintiff, Jermaine Harris, as independent administrator for the Estate of Lee Harris filed a Petition to Approve Settlement and Allocation of Proceeds. (Dkt. No. 107).
2. The Petition seeks approval of settlement and a proposed allocation of proceeds from settlements with Defendants totaling \$7 million. A Release and Settlement Agreement with the City of Chicago was executed on October 15, 2024 in the amount of \$4 million. On information and belief, a separate settlement was reached with Cook County in the amount of \$3 million related to claims against assistant state’s attorney, Cheryl Cesario.
3. The City of Chicago Committee on Finance passed an ordinance on October 30, 2024 authorizing the Corporation Counsel to enter into and execute a settlement order on behalf of the City of Chicago in the amount of \$4 million.

4. The proceeds from the \$4 million settlement with the City were thereafter disbursed in November 2024 in accordance with the October 15, 2024 Release and Settlement Agreement via check to Plaintiff, his counsel, and any lien claimants.

5. To the extent Plaintiff seeks approval of the \$4 million settlement with the City of Chicago entered in accordance with the Release and Settlement Agreement executed on October 15, 2024, the City has no objection.

6. The City takes no position related to the proposed allocation of the proceeds from the \$4 million settlement with the City and/or the proceeds from the \$3 million settlement with the County.

Dated: February 13, 2025

Respectfully submitted,

MARY B. RICHARDSON-LOWRY

Corporation Counsel of the City of Chicago

By: /s/ Elizabeth A. Ekl

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CERTIFICATE OF SERVICE

I hereby certify that on **February 13, 2025**, I electronically filed the foregoing **Defendant City's Response to Petition for Approval of Settlement and Allocation of Proceeds** with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to all counsel of record via the Court's CM/ECF system.

/s/ Elizabeth A. Ekl